

BEV HUGHES
**DEPUTY MAYOR
OF GREATER
MANCHESTER**

Rt Hon Priti Patel,
Secretary of State for the Home Department
2 Marsham Street
London
SW1P 4DF

30th April 2021

Dear Home Secretary

SUBJECT: HMICFRS Inspection: Getting the balance right? An inspection of how effectively the police deal with protests

I write in response to the recent HMICFRS inspection report on the how effectively the police deal with protests.

Members of the public have the right to protest peacefully and this right should continue to be supported. When protests take place it is important that the police are involved in the planning to ensure the safety of those involved and to manage any potential impact upon the wider community. The police handling of protest activity can often be placed under detailed public scrutiny and it is important therefore that effective planning processes are in place to ensure the events can proceed safely and as expected.

I have considered the findings of the inspection and was encouraged that in general the police service has established planning and intelligence processes in place and has the capacity and capability to liaise with event organisers in advance, to ensure the safety of those involved.

The report identifies two recommendations for the police service and three areas for improvement. I can respond to these as follows:

Recommendation 1: By 31 December 2021, chief constables should make sure that their legal services teams subscribe to the College of Policing Knowledge Hub's Association of Police Lawyers group.

I can confirm that the senior leadership team within Greater Manchester Police (GMP) Legal Services have been apprised of the report and members of the team are now subscribed to the College of Policing's Knowledge Hub and have joined the Association of Police Lawyers Group.

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Recommendation 2: By 31 December 2021, chief constables should ensure that their forces have sufficiently robust governance arrangements in place to secure consistent, effective debrief processes for protest policing. Such arrangements should ensure that:

- **forces give adequate consideration to debriefing all protest-related policing operations;**
- **the extent of any debrief is proportionate to the scale of the operation;**
- **a national post-event learning review form is prepared after every debrief; and**
- **the form is signed off by a gold commander prior to submission to the National Police Coordination Centre.**

Since 2019, debrief forms have been completed following such events overseen by Greater Manchester Police, detailing any identified learning and actions. However, following the publication of this inspection report, a written communication has been issued to all public order public safety (POPS) gold commanders, silver commanders and public order public safety advisors, detailing what actions need to be taken at the end of each event in relation to de-briefing and completion of the National Debriefing Form. The process involves a gold commander signing off the form prior to submission to the National Police Coordination Centre (NPoCC). This process has been implemented and will be monitored regularly to ensure compliance.

Area for Improvement 1: Forces should improve the quality of the protest-related intelligence they provide to the National Police Coordination Centre's Strategic Intelligence and Briefing team. And this team should ensure that its intelligence collection process is fit for purpose.

Following an internal restructure of the GMP Force Intelligence Branch (FIB) a number of new intelligence threat desks were created, aligned to the highest harm issues contained within the latest Force Control Strategy. These threat desks are based on the National Intelligence Model (NIM) and they support decision makers at a strategic, tactical and operational level.

The public order and community confidence threat desk was formed in the summer of 2020 and is currently managing an intelligence collection plan for protests. The purpose of the threat desk is to gain a deeper understanding of the threats within the area of business, so that the right intelligence products can be written for senior decision makers, who can then better understand the risks equated to the threat. This intelligence-led process allows decision-makers to deploy resources and tactics appropriately, to mitigate the threat and keep people safe.

All intelligence products are also shared with the NPoCC Strategic Intelligence and Briefing Team (SIB) and the North West Regional Organised Crime Unit (NWROCU). GMP officers also participate in monthly regional meetings with NPoCC SIB in order to share intelligence on cross-border threats and to discuss best practice in tackling new or emerging threats.

Area for Improvement 2: On a national, regional and local basis, the police should develop a stronger rationale for determining the number of commanders, specialist officers and staff needed to police protests.

The numbers for each of the command roles and specialist roles are currently being reviewed through a Public Order Governance Group. This group is chaired by ACC – Specialist Operations. The Governance Group is made up of members of Specialist Operations Planning Unit (SOPU) as well as that of the Specialist Operational Training Team and Counter Terrorism Security Coordinator (CTSecCo) Supervisor. In addition, resourcing data for command roles has been obtained from similar size forces to compare and assess against need.

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Area for Improvement 3: The police's protest-related community impact assessments are an area for improvement, particularly those that need to be completed after the event. These assessments should assist the police to understand fully the impact of protests on communities. They should include assessments of the impact of protest on local residents, visitors to an area, businesses, and the critical infrastructure including transport networks and hospitals.

This is a very important point raised in the report. Community impact assessments are a necessary and important process to assess the wider impact that an incident or event may have. The assessments are used regularly within GMP, which responds to many incidents and events.

The framework in GMP follows a process of scan, analyse, risk/response and assessment (SARA) with each document completed electronically and saved. Completed documents, together with relevant intelligence logs are fed into the National Intelligence Model process via Divisional HUB's and the Community Intelligence Team within the Force Intelligence Branch.

I understand that the Strategic Organisational Learning Board in Greater Manchester Police has commissioned further work on the force-wide governance of Community Impact Assessments to ensure effective oversight of this process. This work is continuing and I will continue to monitor progress.

I am confident that the police have good experience and capability in Greater Manchester in the handling of protests. I will ensure the learning from the HMICFRS report is considered and incorporated into operational practice where appropriate to enable the continued development of the policing response.

Yours sincerely



Rt. Hon Baroness Beverley Hughes
Deputy Mayor for Police and Crime